



**SKIFF
LAW**

MEMO ENDORSED

The conference scheduled for January 5, 2022 is hereby adjourned to January 14, 2022 at 9:30 am. Plaintiffs' time to respond is extended to January 7, 2022.

SO ORDERED:


HON. EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE
December 29, 2021

Gregory J. Skiff, Founder
gjs@skifflaw.com

December 28, 2021

Via CM/ECF

Honorable Edgardo Ramos, U.S.D.J.
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

***Re: United States District Court, SDNY
MSV Synergy, LLC, et ano. v. Shapiro, et al.
Case Number 1:21-cv-07578-ER***

Dear Judge Ramos:

This Firm represents plaintiffs MSV Synergy, LLC and Mark Barron (collectively, the “**Plaintiffs**”) with respect to the above action. I write in furtherance of Paragraph 1(E) of your Individual Practices to request a brief nine-day extension of time to respond to defendants PAZ Global Ventures, LLC’s (“**PAZ**”) and East 125th Development, LLC’s (“**East 125th**”) respective pre-motion conference requests, (*see* Dkt. Nos. 25 and 30), and to adjourn the respective conference set by the Court from January 5, 2022 at 2:30 pm, (*see* Dkt. No. 32), to January 14, 2022 at 9:30 am, (*see* Dkt. No. 34). A proposed form of order is submitted herewith.

The original deadline for Plaintiffs’ responses was set by the Court for December 29, 2021. (*See* Dkt. No. 32.) There have been no prior requests for an extension of time. Since early in the evening, Monday, December 27, 2021, however, I have been consumed with a personal medical emergency involving my three-year-old daughter. Accordingly, I have just this evening been able to turn to finalizing Plaintiffs’ respective responses. While it is possible that I may be able to complete Plaintiffs’ responses before the end of the day tomorrow, the extra time is necessary to ensure a more thorough and substantive response. Further, issue has not yet been joined with respect to any of the defendants and, indeed, two of the defendants have yet to be served. Counsel for East 125th has consented to this request. As of the time of this filing, however, my request for PAZ’s consent has gone unanswered.

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In addition to the foregoing, the Court set Plaintiffs' response to defendants Saadia Shapiro's ("Shapiro") and Shapiro & Associates Attorneys at Law, PLLC's ("S&A") joint pre-motion conference request, (see Dkt. No. 33), for January 7, 2022 and scheduled the conference with respect to that request for January 14, 2022 at 9:30 am, (see Dkt. No. 34).

Based on the foregoing unexpected and extraordinary circumstances, Plaintiffs respectfully request that the Court grant Plaintiffs' request for a nine-day extension of time, allowing Plaintiffs to submit their respective responses to PAZ's and East 125th's pre-motion requests the same day as for S&A's pre-motion request (*i.e.*, January 7, 2022) and adjourning the above January 5 conference to the same day as the conference on S&A's pre-motion request (*i.e.*, January 14, 2022 at 9:30 am).

Thank you for Your Honor's time and attention with respect to this matter.

Respectfully,

SKIFF LAW FIRM LLC



Gregory J. Skiff

cc: Saadia Shapiro, Esq., *pro se* (via CM/ECF)
Jonathan Temchin, Esq. (via CM/ECF)
Joshua Reid Brostein, Esq. (via CM/ECF)
Steven David Isser, Esq. (via CM/ECF)